



EXPLANATION OF SIGNIFICANT DIFFERENCES

Jennison-Wright Superfund Site
Granite City, IL

U.S. Environmental Protection Agency
Region 5

EXPLANATION OF SIGNIFICANT DIFFERENCES
Jennison-Wright National Priorities List Site
1190400008 - Madison County
Granite City, Illinois

Introduction to the Site and Statement of Purpose

An Explanation of Significant Differences ("ESD") has been prepared by the United States Environmental Protection Agency ("U.S. EPA") for the Jennison-Wright National Priorities List ("NPL") Site, located in Granite City, Illinois to document a change in the September 29, 1999 Record of Decision ("ROD") for the site. There are a number of circumstances that necessitate an ESD.

First, physical and practical limitations of the ability to excavate soil along the eastern side of the site have resulted in the need for institutional controls. The presence of groundwater contamination above cleanup levels will also require institutional controls.

Second, since the signing of the ROD, Granite City has made the decision to close the section of 22nd Street that bisects the site. This means that the street will no longer receive routine maintenance and eventually will not provide an adequate barrier to prevent direct contact with underlying contaminated soils, and/or will allow rainwater to penetrate the surface and potentially mobilize contaminants. It was decided to excavate these soils and remove them from the site.

The third circumstance is the determination that anaerobic biodegradation of contaminants in the groundwater was more viable than aerobic degradation. This was based on additional data that was collected, and on advancements in knowledge of in situ treatments. Therefore, instead of injecting oxygen release compounds into the aquifer, a hydrogen release compound will be used.

The fourth and last circumstance that necessitates an ESD was the discovery of a substantial amount of non-aqueous phase liquids ("NAPL") in a disposal pit once excavation reached the groundwater table. The pit was a former disposal area for an asphalt sealant product called Jennite, which was manufactured at the site in the 1980s. This ESD will document the steps already taken to address the NAPL and will provide a contingency remedy if additional NAPL and groundwater contamination are found. Because a hot water flushing system for NAPL and a groundwater treatment plant were components of the original ROD, it is not expected that treating this additional NAPL and groundwater will significantly increase the cost of the remedy.

While there are three distinct categories for post-ROD changes, the Illinois Environmental Protection Agency ("Illinois EPA") concurs with this proposed change to the 1999 ROD and agrees that it fits into the Explanation of Significant Differences category.

Explanation of Significant Differences Jennison-Wright National Priorities List Site

I. Introduction

A. Site Name and Location

The Jennison-Wright NPL site is a former wood-preserving site located in Granite City, Illinois, which is about six miles northeast of Saint Louis, Missouri. The site is bisected by 22nd Street, with former storage areas for untreated and treated wood located north of 22nd Street, and the former facility process area located to the south of the street. The area surrounding the site is a mixed residential-industrial neighborhood. A water treatment facility borders the site to the north, railroad tracks and a rail yard border the site to the east and south, and an alley and residences are located to the west of the site.

B. Lead and Support Agencies

Illinois EPA is the lead agency for the implementation of the fund-lead remedial action. U.S. EPA is the support agency.

C. Statement of Purpose and Statutory Basis

This decision document sets forth the basis for the determination to issue an Explanation of Significant Differences to the September 29, 1999 Record of Decision for the Jennison-Wright Superfund site, in Granite City, Illinois. Section 117(c) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended ("CERCLA")¹ and 40 Code of Federal Regulations ("CFR") 300.435(c)(2)(i) and 300.825(a)(2) of the National Contingency Plan state that U.S. EPA shall publish an Explanation of Significant Differences between the remedial action being undertaken at a site and the remedial action set forth in the ROD if U.S. EPA determines that the remedial action at the site differs significantly from the remedial action selected in the ROD. U.S. EPA shall also publish the reasons such changes are being made. U.S. EPA policy and regulations² indicate that an ESD, rather than a ROD amendment, is appropriate where the changes being made to the remedial action are significant but do not fundamentally alter the overall remedy with respect to scope, performance, or cost. In addition to the 1999 ROD, this ESD serves to modify the remedial actions set forth in the ESD published in 2005.

D. Summary of Circumstances Necessitating this ESD

A number of circumstances have required this ESD to be written. First, physical and practical limitations on the ability to excavate soils along the eastern side of the site have resulted in the need for institutional controls that were not anticipated in the ROD, and the presence of groundwater contamination above cleanup levels will require institutional controls to be

¹ 42 United States Code (USC) § 9617(c)

² See 40 CFR 300.435(c) (National Contingency Plan); EPA Office of Solid Waste and Emergency Response Directive 9355.3-02

implemented. Secondly, since the ROD was signed, Granite City made the decision to close the section of 22nd Street adjacent to the site. This means that the street will no longer be routinely maintained and may not adequately serve as a barrier to prevent direct contact with contaminated soils underneath the street. These contaminated soils will therefore need to be excavated and removed from the site.

Another circumstance that necessitates this ESD is the determination that anaerobic biodegradation of contaminants in groundwater was more viable than aerobic degradation. This determination was made based on additional data that was collected and on advancements in knowledge about each type of in situ treatment approach. Therefore, instead of injecting oxygen release compounds into the aquifer, a hydrogen release compound was injected.

The last circumstance that necessitates this ESD was the discovery of a substantial amount of NAPL in a disposal pit once the excavation reached the groundwater table. The pit is a former disposal area for an asphalt sealant product, called Jennite, which was manufactured at the site in the 1980s. Previous sampling and soil borings in the area did not indicate the presence of NAPL beneath the bottom of the pit in this area. This ESD documents how this NAPL was addressed and also presents a contingency remedy in case additional NAPL and groundwater contamination are found in the area. Because a hot water flushing system for NAPL and a groundwater treatment plant were components of the original remedy in the 1999 ROD, it is not expected that treating this additional NAPL and groundwater will significantly increase the cost of the remedy.

E. Agency Determination

U.S. EPA, in consultation with Illinois EPA, has reviewed the changes to the Jennison-Wright site remedial action in accordance with CERCLA and U.S. EPA policy and guidance and has determined that the changes to the ROD remedial action are significant but do not fundamentally alter the overall site remedial action with respect to scope, performance, or cost. The revised remedy complies with the NCP and the statutory requirements of CERCLA and remains protective of human health and the environment. Thus, it is appropriate to issue an ESD to document the changes.

F. Administrative Record

In accordance with 40 CFR 300.435(c) and 300.825(a)(2) of the National Contingency Plan, this ESD and supporting documentation will become part of the Administrative Record for the Jennison-Wright site. The Administrative Record is available for public review at the following location:

U.S. EPA Region 5 Records Center
77 West Jackson Boulevard - 7th Floor
Chicago, Illinois 60604
8:00 A.M. to 4:00 P.M. Monday - Friday

An information repository is also located at:

Granite City Public Library
Six Mile Regional Library District
2001 Delmar Avenue
Granite City, Illinois 62040

Hours (September through May):

Monday-Thursday: 9am-8pm

Friday-Saturday: 9am-5pm

Hours (June through August):

Monday and Wednesday: 9am-8pm

Tuesday, Thursday, Friday and Saturday: 9am-5pm

II. Site History, Contaminants and Selected Remedy

A. Site History

Operations at the Jennison-Wright facility began prior to 1921 and continued until 1989. During this time, three companies operated at the site: Midland Creosoting Company (prior to 1921 through 1940), Jennison-Wright Corporation (1940 through 1981), and 2-B-J-W Inc. (1982 through 1989). The main activities during the site's operational history consisted of treating wood products, including wood block flooring and railroad ties, with pentachlorophenol (PCP), creosote and zinc naphthenate. The creosote process was the first wood preserving process used and took place at the site from prior to 1921 to 1989. Pentachlorophenol was used from 1974 to 1985, and zinc naphthenate was used from 1985 to 1989. Beginning in the early 1960s, an asphalt sealer product referred to as Jennite was also manufactured on the site. The Jennite product was composed of coal tar pitch, clay and a latex/rubber compound. The main areas of contamination at the site were the PCP process area, where a treatment cylinder and storage tanks containing PCP were located; the Jennite Pit, where creosote and Jennite waste products were disposed of; the 22nd Street Lagoon, where creosote and PCP waste were stored; and an area in the northeast corner of the site (Attachment 1).

In 1992, Illinois EPA used monies from the bankruptcy sale of the Jennison-Wright Corporation to initiate stabilization efforts on the site. Stabilization efforts included removal and temporary on-site storage of material flowing out of the Jennite Pit, construction of a clay cap over the pit, disposal of asbestos containing material, and stabilization and temporary storage of approximately 175 drums of waste material. A removal action was conducted at the site in 1994 and consisted of installation of a chain-link fence around stockpiled soil and a drainage area in the northeast corner of the site, excavation and disposal of soils from around the upright storage tanks and rail cars, removal of waste from a variety of storage vessels and treatment and off-site disposal of the waste, decontamination and dismantling of the storage vessels, characterization of the waste in the drums temporarily stored on-site and proper disposal of the drummed waste, installation of a geomembrane cap over the Jennite Pit, removal of contaminated soil in three tanks in the southern portion of the site, and dismantling and disposal of the three tanks.

Another limited removal action was conducted in 2003 to remove the on-site buildings and associated asbestos-containing material and to dispose of several aboveground storage tanks, underground storage tanks, and an oil/water separator. The remedial action to address the remaining on-site contamination began in 2004.

B. Contaminants and Selected Remedy

Contaminants of concern in site soil included phenols, dioxins, and a number of semi-volatile organic compounds ("SVOCs"), most of which were polynuclear aromatic hydrocarbons ("PAHs"). Benzo(a)pyrene, a PAH, was detected in site soil samples at a maximum concentration of 2,800,000 micrograms per kilogram ("ug/kg"), and another PAH, naphthalene, was detected at concentrations up to 4,200,000 ug/kg. Pentachlorophenol ("PCP") was detected in site soils at concentrations up to 670,000 ug/kg. Dioxins were detected in site soils at a toxicity equivalency factor ("TEF") of up to 66 ug/kg. Groundwater at the site contained phenols and PAHs, as well as volatile organic compounds ("VOCs") such as benzene, xylenes, and toluene. The most significant areas of groundwater contamination identified were in the northeast corner of the south portion of the site near the 22nd Street lagoon and the former PCP treatment process area. Phenol was detected in groundwater at concentrations up to 9,800 microgram per liter ("ug/l"), PCP at concentrations up to 88,000 ug/l, and naphthalene at concentrations up to 21,000 ug/l. Sample results collected from the site indicate that in shallow groundwater, PCP contamination is highest in the vicinity of the former PCP process area and the 22nd Street lagoon. PCP concentrations are significantly lower in the intermediate groundwater samples collected in these areas, suggesting that limited downward migration of PCP in groundwater has occurred at the site.

The distribution of PAHs in groundwater is different than the PCP distribution. In shallow groundwater, PAH contamination is highest in the vicinity of the 22nd Street lagoon, with lower concentrations present in the northeast corner of the site (Area H) and near the Jennite pit. The results of groundwater samples collected from locations down gradient of these areas indicate that limited migration of PAHs in groundwater has occurred within this shallow zone. High PAH concentrations, however, are still present in the intermediate and deep groundwater samples collected in the vicinity of the 22nd Street lagoon, suggesting that downward migration of PAHs has occurred at the site. PAH contamination was also detected in intermediate groundwater samples collected in the vicinity of the former PCP process area.

To address the contamination, the remedy selected by Illinois EPA in the 1999 ROD consisted of:

- For site wastes consisting of the drip track residue and the oils found on-site, the selected alternative was to remove the waste and have it disposed of at a hazardous waste facility.
- For site soils, a land farm would be constructed in the northeast portion of the site.
- For NAPL removal, hot water flushing was the selected alternative.
- For the more highly contaminated groundwater plumes, the preferred alternative was enhanced in situ biological treatment using an oxygen release compound to facilitate aerobic degradation and air sparging rather than natural attenuation and ex situ

biological treatment. Natural attenuation was the selected alternative for the other areas of the site where the groundwater contamination was at a much lower level.

- The buildings and other structures on the site would be razed, asbestos containing materials inside the buildings would be abated, and debris piles, storage tanks, abandoned steel trams, and sumps and pits would be removed.

The general remedial action objectives developed for the Jennison-Wright site were:

- Prevent current nearby residents and potential future site workers from contacting, ingesting, or inhaling on-site soil and waste materials containing contaminants that exceed the calculated risk-based cleanup objectives;
- Prevent the continued release of contaminants to groundwater;
- Initiate long-term groundwater restoration to maximum contaminant levels ("MCLs");
- Abate regulated asbestos containing material present in the on-site buildings;
- Remove listed hazardous waste from the site for treatment and disposal at a licensed facility; and
- To the extent practical, pump NAPLs from the subsurface in the vicinity of the 22nd Street lagoon and treat collected groundwater.

An ESD signed in 2005 documented the change from land farming of site soils to off-site disposal.

Soil cleanup objectives at the Jennison-Wright site are based on inhalation and ingestion scenarios for a commercial/industrial property and a construction worker scenario. Cleanup objectives for groundwater were based on a residential use scenario and drinking water standards. Cleanup objectives for soil and groundwater are shown in Attachment 2.

The full text of the 1999 ROD for the Jennison-Wright site can be found at the following web site: www.epa.gov/superfund/sites/rods.

III. Basis for the ESD

Table 1 summarizes the changes to the remedy being documented in this ESD. Further descriptions of the changes are provided in the subsequent section. Based on these changes, the remedy will continue to be protective and meet applicable or relevant and appropriate requirements ("ARARs"). In addition, all remedial action objectives, as listed in the previous section, will continue to be met. Because hazardous waste will remain on site at levels that do not allow for unrestricted use and unlimited exposure, five-year reviews of the site remedy will be required.

Table 1: Changes to Remedy Being Documented in ESD

Remedy Component in 1999 ROD and 2005 ESD	Change in Remedy Documented in ESD
Off-site disposal of listed hazardous waste	No change
Off-site disposal of non-listed contaminated soil	No change (previous change from land farming to off-site disposal was documented in 2005 ESD)
Hot water flushing of NAPL in vicinity of 22 nd Street lagoon	No change
Natural attenuation of less contaminated groundwater	No change
Cleanup goals for groundwater based on drinking water standards (maximum contaminant levels (MCLs))	No change
Cleanup goals for soil based on commercial/industrial use of site	No change
In situ aerobic biodegradation of highly contaminated groundwater (not associated with NAPL) using oxygen release compounds	In situ anaerobic biodegradation of highly contaminated groundwater (not associated with NAPL) using a hydrogen release compound
No remedial action required	Excavation and disposal of contaminated soil beneath two sections of 22 nd Street adjacent to the site
No remedial action required	Extraction and off-site disposal of NAPL in vicinity of Jennite Pit
No remedial action required	Contingency remedy for Jennite Pit area consisting of using hot water flushing to extract NAPL and treating contaminated groundwater in on-site groundwater treatment plant
Institutional controls required to restrict use of site to commercial/industrial purposes	Additional institutional controls required to prohibit excavation of soils (and other appropriate land use restrictions) and/or restrict groundwater use in the following areas: to west of site in alley, near 22 nd Street near eastern border of site, in the northeast corner of the site, and along the eastern border of site between 22 nd Street and southern boundary of site. Groundwater use restrictions will also be applied to all on-site areas where groundwater cleanup objectives have not yet been met.

IV. Significant Differences to the ROD Remedial Action

A. Implementation of Institutional Controls

Several areas will require institutional controls that were not required in the Record of Decision for the Jennison-Wright site. The only institutional control referenced in the ROD and the first Explanation of Significant Differences (2005) was a zoning restriction to ensure the site property continued to be used for commercial and industrial purposes only. In both the 1999 ROD and 2005 ESD, soil cleanup objectives at the Jennison-Wright site were based on inhalation and ingestion scenarios for a commercial/industrial property and a construction worker scenario. No institutional controls for groundwater were required in the ROD because the cleanup objectives for groundwater were based on a residential use scenario and drinking water standards. This Explanation of Significant Differences documents several areas for which institutional controls restricting land and/or groundwater use will be required. These institutional controls will be placed on the site in the form of an Environmental Covenant pursuant to the Uniform Environmental Covenants Act (765 Illinois Compiled Statutes ("ILCS"), Chapter 122 ("UECA")). Illinois EPA will complete the Environmental Covenant no later than six months after construction is complete at this site.

Three areas will require institutional controls prohibiting soil excavation and imposing other appropriate land use restrictions because it was not possible to achieve soil cleanup objectives in these areas. The three areas are to the east of the eastern border of the site extending from 22nd Street to the southern site boundary, a former drip track area in the vicinity of 22nd Street along the eastern boundary of the site, and an area in the northeast corner of the site referred to as Area H. The additional institutional controls in the area to the east of the eastern border of the site will include prohibiting excavation and restricting groundwater use. Institutional controls in the former drip track area and near Area H will include prohibiting excavation only. Other appropriate land use restrictions may be applied in addition to prohibiting excavation. Soil excavation and off-site disposal in these areas was not feasible due to an active railroad yard adjacent to the site. Excavation near the railroad could lead to instability in the foundation of the tracks. In addition, gaining access to a railroad right-of-way for the purposes of excavating soil near a railroad track was not feasible. Implementation of these institutional controls for soil will ensure that one of the site remedial action objectives, that is, preventing current nearby residents and potential future site workers from contacting, ingesting, or inhaling on-site soil and waste materials containing contaminants that exceed the calculated risk-based cleanup objectives, is met.

In addition, because it will take time for groundwater cleanup objectives to be achieved, institutional controls restricting the use of groundwater, including prohibiting drilling of wells for drinking, will be required for all portions of the site with groundwater contamination above cleanup levels and also for several off-site areas. These institutional controls will ensure that there is no exposure to groundwater containing contaminants above cleanup objectives. The off-site areas for which these institutional controls will be required are in an alley adjacent to the western side of the southern portion of the site and to the east of the eastern border of the site extending from 22nd Street to the southern site boundary. The area near the eastern border of the site will also need institutional controls restricting land use, as discussed in the previous

paragraph. In the alley to the west of the site, soil contamination above cleanup levels was not detected beyond the property boundary, so institutional controls are only needed to restrict groundwater use. For the entire site, the objective of the selected remedies for groundwater, extraction and treatment, in situ bioremediation, and monitored natural attenuation, is to restore groundwater to its beneficial use (drinking water); however, prior to those objectives being achieved, institutional controls will be implemented to ensure groundwater is not used for drinking.

B. Anaerobic Biodegradation Instead of Aerobic Biodegradation

Based on information collected since the ROD was signed in 1999, it was determined that anaerobic degradation was more appropriate than aerobic biodegradation for addressing the highly contaminated groundwater at the site. This determination was made based on additional data that was collected and on advancements in knowledge about each type of in situ treatment approach. Anaerobic biodegradation has been shown to be highly effective at degrading compounds containing chlorine, such as PCP. Because the PCP contamination in groundwater is found at several locations throughout the site, it was determined that anaerobic biodegradation was more suitable. Therefore, instead of injecting oxygen release compounds into the aquifer, a hydrogen release compound was injected. A pilot test was conducted in 2001. Within the test area, PCP concentrations were initially 100,000 ug/l, and after one year, the concentrations dropped to 1,900 ug/l. Based on the results of the pilot test, a site-wide application of the anaerobic process was made. Based on recent groundwater data, the entire northern parcel has been remediated and only the most heavily contaminated areas, where PCP source soil have just been removed, continues to exceed the cleanup objectives. Additional injections of hydrogen release compound may be required.

C. Excavation and Disposal of Contaminated Soil beneath 22nd Street

During the time the site was operating as a wood treatment facility, the treatment processes and equipment were located in the southern portion of the site and the northern portion of the site was used as a drying and storage area. 22nd Street runs east to west and bisects the site. Tram tracks for transporting treated material between the southern and northern portions of the site were located at four locations along 22nd Street. In the ROD, the excavation of 22nd Street was not required because the street would serve as a barrier to prevent direct contact with any contaminated soil. Since the ROD was signed, Illinois EPA learned that Granite City made the decision to close the section of 22nd Street adjacent to the site. This meant that the road would no longer be maintained and could not be relied on as a barrier to prevent direct contact with potentially contaminated soil beneath the street. Therefore, excavation and off-site disposal of the soil will be necessary. Sampling of all four sections of the street showed that three of the sections contained soil contamination above cleanup objectives. The soil in two of these three sections will be excavated and disposed of off-site. The third section of 22nd Street that is contaminated above cleanup levels is located directly north of the 22nd Street lagoon. As discussed in Paragraph A above, due to the proximity of an active railroad track and multiple buried and overhead utilities, however, it is not feasible to excavate soil in this area. Institutional controls to restrict land use near this third contaminated section of 22nd Street will be implemented.

D. Remediation of NAPL in Jennite Pit and Contingency Remedy for Additional NAPL and Contaminated Groundwater

The final modification to the remedy selected in the 1999 ROD is the extraction and off-site disposal of NAPL found in the on-site Jennite disposal pit and the identification of a contingency remedy in case additional NAPL and contaminated groundwater are found in this area. During remedial action, a substantial amount of NAPL was discovered in the Jennite disposal pit once the excavation reached the groundwater table. Based on groundwater sampling, it is believed that the free product encountered is dense non-aqueous phase liquid ("DNAPL") and that little to no light non-aqueous phase liquid ("LNAPL") exists within the area. Although samples of the DNAPL have not been submitted for laboratory analysis, analysis of groundwater within 22nd Street lagoon area, which is believed to be similar to the Jennite Pit, detected 2,4-dimethylphenol, acenaphthene, benzo(a)anthracene, benzo(c)pyrene, benzo(b)fluoranthene, benzo(k)fluoranthene, chrysene, fluorene, dibenzo(a,h)anthracene, indeno(1,2,3-cd)pyrene and naphthalene. To address the NAPL encountered at the bottom of the excavation during remedial action, groundwater in the pit was pumped out, temporarily stored on site, and then shipped off-site for disposal. Then, as much as possible of the NAPL-contaminated soil was excavated from the pit and shipped off-site for disposal. Additional investigative work will further define the extent of the NAPL and contaminated groundwater in the area.

In anticipation of possibly having to implement a contingency remedy to address additional NAPL and contaminated groundwater in the area of the Jennite Pit, the planned groundwater treatment plant will be relocated so that it is closer to the Jennite Pit. The planned groundwater treatment plant is part of the remedy selected in the 1999 ROD, which called for using hot water flushing to extract the NAPL near the 22nd Street lagoon, separating the extracted NAPL from the groundwater, and then treating the groundwater in the on-site treatment plan. The 22nd street lagoon is located approximately 300 feet north of the Jennite Pit, so the design for the groundwater treatment plant will be modified so that it is more centrally located between the 22nd Street lagoon and the Jennite Pit area. If additional investigation shows that NAPL and contaminated groundwater are located beneath the former Jennite Pit, hot water injection wells and NAPL extraction wells will be installed in the area, and the NAPL and contaminated groundwater will be treated in the groundwater treatment plant. Because a hot water flushing system for NAPL and a groundwater treatment plant were components of the original remedy in the 1999 ROD, it is not expected that treating this additional NAPL and groundwater will significantly increase the cost of the remedy.

V. Statutory Determinations

U.S. EPA has determined that with the application of institutional controls, the use of in situ anaerobic biodegradation instead of aerobic biodegradation, the excavation and disposal of soils beneath 22nd Street, the extraction and off-site disposal of NAPL from the Jennite Pit, and the identification of a contingency remedy for potential additional NAPL and groundwater contamination in the Jennite Pit area, as documented in this ESD, is in accordance with Section 121 of CERCLA and is protective of human health and the environment. These changes comply with federal and state requirements that are applicable or relevant and appropriate, use permanent solutions to the maximum extent practicable, and are cost-effective. Since

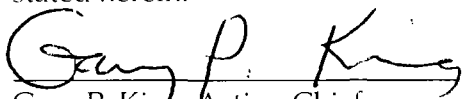
hazardous waste remains on site at levels that do not allow for unrestricted use and unlimited exposure, five-year reviews of the site remedy will be required.

VI. Public Participation Compliance

U.S. EPA shall publish a notice of availability and a brief description of this ESD in the local newspaper as required by the NCP (40 CFR 300.435(c)(2)(i)(B)). This ESD will also be placed in the Administrative Record files and information repository which are located at the Granite City Public Library and the U.S. EPA office as required by the NCP (40 CFR 300.435.(c)(2)(i)(A)). See Section I, Paragraph F of this ESD (pages 4 and 5) for further information about the information repositories.

VII. Declaration by Illinois EPA

U.S. EPA has determined, and Illinois EPA concurs, that the adjustments to the Jennison-Wright NPL site ROD provided in this ESD are significant but do not fundamentally alter the overall site remedial action with respect to scope, performance, or cost. I therefore approve the issuance of this ESD for the Jennison-Wright NPL site and the changes to the remedial action stated herein.



Gary P. King, Acting Chief

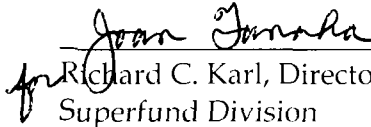
Bureau of Land

Illinois Environmental Protection Agency

4/30/09
Date

VIII. Declaration by U.S. EPA

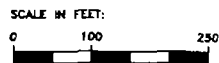
EPA has determined that the adjustments to the Jennison-Wright site ROD provided in this ESD are significant but do not fundamentally alter the overall site remedial action with respect to scope, performance, or cost. I therefore approve the issuance of this ESD for the Jennison-Wright site and the changes to the remedial action stated herein.



Richard C. Karl, Director
Superfund Division
U.S. EPA Region 5

6/5/09
Date

ATTACHMENT 1



ATTACHMENT 2

CLEANUP OBJECTIVES JENNISON WRIGHT SUPERFUND SITE		
Soil COPC	Proposed CUO (µg/kg)	IEPA TACO Tier 1 (µg/kg)
Benzene	3,000 ^a	2,100
Benzo(a)anthracene	14,000 ^b	170,000
Benzo(a)pyrene	2,000 ^c	17,000
Benzo(b)fluoranthene	22,000 ^c	170,000
Benzo(k)fluoranthene	32,000 ^b	1,700,000
Naphthalene	27,000 ^a	8,200,000
Carbazole	954,000 ^c	None
Dibenzo(a,h)anthracene	2,000 ^c	17,000
Indeno(1,2,3-cd)pyrene	11,000 ^b	170,000
PCP	51,000 ^b	520,000
TCDD-TEF	1	None

CLEANUP OBJECTIVES JENNISON WRIGHT SUPERFUND SITE		
Groundwater COPC	Proposed CUO (µg/L)	IEPA TACO Tier 1 (µg/L)
Arsenic	50	50
Benzene	10	5.0
Benzo(a)anthracene	0.13	0.13
Benzo(b)fluoranthene	0.18	0.18
Benzo(k)fluoranthene	0.4	0.17
Chrysene	4	1.5
PCP	1.0	1.0
alpha-BHC	0.03	0.03
Manganese	200	None
Naphthalene	400	25
2,4-Dimethylphenol	200	140
2-Methylphenol	500	350